

ALLGEIER, MARTIN & ASSOCIATES, INC.

CONSULTING ENGINEERS AND ARCHITECTS

JOPLIN, MISSOURI 64803

TELEPHONE
417 624-5703

September 26, 1983

2820 RANGELINE
P.O. BOX 2277

EPA-ARWM/PMTS

SEP 29 1983

Region VII K.C., MO

Mr. Joe Davis
Missouri Dept. of Natural Resources
P. O. Box 1368
Jefferson City, Missouri 65102

Re: Talbot Industries, Inc.
Neosho, Missouri

Dear Mr. Davis:

A copy of our report to the EPA regarding Talbot Industries pickle liquor is enclosed. We are advised by phone conversation today with Ms. Betti Harris that Talbot's request, by virtue of 40CFR261.6, for withdrawal from the Hazardous Waste Generator list is accepted.

We have had considerable previous correspondence with MDNR regarding this matter, and enclose a copy of Carol Eighmey's letter of April 13, 1983.

At that time, we began pursuing EPA delisting by petition as recommended in Ms. Eighmey's letter. However, we were recently advised by Ms. Betti Harris, EPA, that all delisting by petition was temporarily suspended, not through any fault or problem with Talbot Industries. Ms. Harris further advised us to abandon delisting by petition in favor of invoking 40CFR261.6, which we have done.

From Ms. Eighmey's letter, we understand that MDNR can delist a listed hazardous waste at a specific site only "unless EPA has already done so."

The EPA delisting requirement is now satisfied, and we, therefore, ask MDNR to delist Talbot Industries from the Missouri Hazardous Waste Generators.

We particularly ask that this delisting action be accomplished soon enough to precede the new Missouri tax collection on hazardous waste generators to save Talbot Industries any unnecessary expense.

Please contact me or Alex Bourne, Vice President, Engineering, Talbot Industries, Inc. if you have any questions.

Very truly yours,

ALLGEIER, MARTIN & ASSOCIATES, INC.


Paul Trencham, P.E.


R00354328
RCRA RECORDS CENTER

PT/f

Enclosures

cc W/Encl.: EPA - Bob Stewart, Betti C. Harris

MDNR - Frank Dolan, Carol R. Eighmey

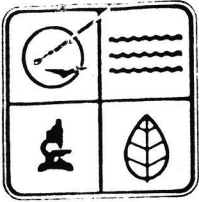
Joe Jansen, Bert McCullough,

Joe Nixon,

Gene Schwartz, President, Talbot Industries, Inc.

Alex Bourne, Vice Pres., Talbot Industries, Inc.

COPY



RECEIVED APR 18 1983

April 13, 1983

MISSOURI DEPARTMENT OF NATURAL RESOURCES
P.O. Box 1368 1915 Southridge Drive Jefferson City, Missouri 65102 (314) 751-3241

Mr. Alex Bourne
Vice President - Engineering
Talbot Industries, Incorporated
1211 Harmony Street
P. O. Box 608
Neosho, Missouri 64850

Dear Mr. Bourne:

Dr. David E. Bedan has requested that I respond to your letter of March 18, 1983, concerning the status of Talbot Industries as a generator of hazardous wastes. Spent pickle liquor from your facility is listed in 40 CFR 261.32 of the U.S. EPA Regulations and 10 CSR 25-4.010(6) of the Missouri Hazardous Waste Management Regulations as K062, because of corrositivity and toxicity (lead and chromium). The Missouri Department of Natural Resources does not have authorization from EPA to delist a listed hazardous waste at a specific plant site at this time unless EPA has already done so. The following steps should be taken to delist the waste in accordance with 40 CFR, part 260.22 and 10 CSR 25-4.010(7):

1. Contact Mr. Myles Morse or Mr. William Sproat with the U.S. EPA, telephone number ~~(202) 755-9187~~, to *202-382-4770* initiate the delisting process; and *401 M St S.W. Washington D.C. 20460*
2. DNR should be copied on all laboratory reports and any correspondence sent to EPA.

Until the pickle liquor is delisted, Talbot Industries should register the waste pickle liquor with the Missouri Department of Natural Resources in accordance with 10 CSR 25-5.010. Talbot Industries may continue discharging the treated pickle liquor into the Neosho POTW, in accordance with 260.395(13), RSMo (1980), as long as the facility is willing to accept the waste. Also, the hazardous waste generator fee is not applicable to this waste since it is discharged to the POTW.

COPY

Christopher S. Bond Governor
Fred A. Lafser Director

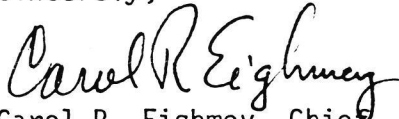
Division of Environmental Quality
Robert J. Schrelber Jr., P.E. Director

Mr. Alex Bourne
April 13, 1983
Page 2

I apologize for the misunderstanding relative to your status as generator. Since Talbot Industries registered as a generator in 1980, it remains in our computer file as such until formally removed by the delisting process described herein. This is why you continue to receive correspondence from this office.

If there are questions concerning these procedures, please feel free to contact Mr. Joe Davis at (314) 751-3241, of my staff.

Sincerely,

A handwritten signature in cursive script, reading "Carol R. Eighmey".

Carol R. Eighmey, Chief
Planning and Management Section
Waste Management Program

CRE:KJD:ms

cc: Springfield Regional Office
Ms. Betti Harris, U.S. EPA, Region VII

ALLGEIER, MARTIN & ASSOCIATES, INC.

CONSULTING ENGINEERS AND ARCHITECTS

JOPLIN, MISSOURI 64803

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EPA-ARWM/SPRS

SEP 28 1983

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2820 RANGE LINE
P.O. BOX 2277

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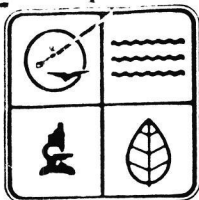
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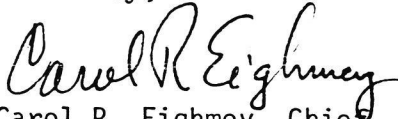
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Carol R. Eighmey, Chief
Planning and Management Section
Waste Management Program

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Ms. Betti Harris, U.S. EPA, Region VII

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P. O. BOX 2277

JOPLIN, MISSOURI 64803



MR. BOB STEWART
U. S. ENVIRONMENTAL PROTECTION AGENCY
WASTE MANAGEMENT BRANCH
324 E. 11TH STREET
KANSAS CITY, MO 64106